

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”) an individual,
Kenneth Petty, AKA (“Zoo”), an individual

Defendants.

Declaration of Steven N. Gordon

Civil Action No. 21-cv-4568

I, **Steven N. Gordon**, hereby declare pursuant to 28 U.S.C. §1746 the following:

1. I am an attorney admitted to the Bar of this Court. I am associated with Tsynguaz & Associates, P.C., and together with Tyrone Blackburn, represent the Plaintiff Jennifer Hough (“Plaintiff”).
2. I submit this Declaration in Support of Plaintiff’s Motion for Entry of Default Judgment against Defendant Kenneth Petty (“Defendant Petty”) pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 55(b) and Local Civil Rule 55.2(b).
3. Prior to filing this motion, I conducted an investigation into whether Defendant Petty was an active member of the military. Pursuant to Judge Eric N. Vitaliano’s Rules, Rule III. F., I searched for Defendant Petty on the Servicemembers Civil Relief Act website and confirmed that he is not a member of the military, active or otherwise. *See* Search Results from the Servicemembers Civil Relief Act website annexed hereto as **Exhibit “A”**.
4. I have reviewed the Declaration of Plaintiff’s Process Server, and his Proof of Service affidavit for Defendant Petty dated September 15, 2021. Process was properly served pursuant to

FRCP Rule 4(e) and, pursuant to the joint letter submitted on October 25, 2021 [Dkt. No. 24] and the Court's subsequent October 26, 2021 Order for filing the instant motion.

5. On October 22, 2021, I engaged in email correspondence with Defendant Maraj's counsel Mr. Judd Burstein in an attempt to reach a resolution on a briefing schedule for his pending motion [Dkt. No. 17]. In the email correspondence, I discussed petitioning the Court for a Traverse Hearing based upon Mr. Burstein's baseless claim that my co-counsel and I are lying about serving Defendant Petty. *See* the October 22, 2021 Email Correspondence annexed hereto as **Exhibit "B"**. Not so coincidentally, three days later, counsel for Defendant Petty, Mr. Steven D. Isser, filed a notice of appearance.

6. Upon information and belief, based on their mutual affiliation with the Law of Offices of Jay Goldberg, Mr. Burstein and Mr. Isser are colleagues and friends. Upon information and belief, they are colluding together to defend this action.

I declare under penalty of perjury that the preceding is true and correct.

Executed on October 27, 2021.

/s/ Steven N. Gordon
Steven N. Gordon